## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA, \*

v. \* CRIMINAL NO. 1:22-336-SAG

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ANNA GABRIELIAN and JAME LEE HENRY,

Defendants.

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## CONSENT MOTION TO MODIFY ANNA GABRIELIAN'S CONDITIONS OF RELEASE

The Court Order setting Anna Gabrielian's conditions of release places her under home confinement, where she is "restricted to 24-hour-a-day lock-down at [her] current residence except for medical necessities, attorney visits, court appearances, or other activities specifically approved by the court." ECF 10. Ms. Gabrielian seeks Court permission to modify her conditions of release for a three-day period this month as specifically disclosed to, and consented to, by pretrial services and Government counsel, with any changes to be specifically approved by pretrial services and Government counsel in advance.

Respectfully submitted,

## SCHERTLER ONORATO MEAD & SEARS, LLP

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 $Counsel\ for\ Anna\ Gabrielian$ 

## CERTIFICATE OF SERVICE

I hereby certify that on the  $7^{\rm th}$  day of April 2023, a true and correct copy of the foregoing was electronically filed and served on counsel for the United States through ECF.

/s/ Noah Cherry